



The Commonwealth of Massachusetts
Executive Office of Public Safety and Security

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National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW., HCHB Room 7324
Washington, DC 20230

Attn: FirstNet NOI

To whom it may concern:

The Commonwealth of Massachusetts offers the following comments concerning the development of the National Public Safety Broadband network:

- End user subscription costs must not exceed commercially available services
- Establish governance process early on
- Develop and present sustainability model
- Clear identification of any state mandates/requirements (state assets)
- FirstNet **develops cooperative partnerships** with a state/local/tribal or any combinations thereof (as an example MA, NH, VT, ME, RI) vs just including them in the consultation process
- Initiate and maintain cooperative outreach program for stakeholders
- State/Local infrastructure (backhaul, etc) should be considered when cost effective and if used should be considered an in-kind contribution to defer the subscriber costs
- Many State and local agencies have ordinances requiring broadband infrastructure that could be leveraged to aid the deployment of the nationwide network
- Many State and local agencies have resources such as existing infrastructure: towers, fiber networks, broadband services that could be leveraged in the build out

- Architecture decisions at this point could be premature as the FirstNet consultation process has not yet taken place.
- Adopt an iterative approach with regular communication from FirstNet
- Establish communication/feedback process early on - use of surveys
- Build and maintain consensus of all parties
- Commitment to reliability - system criticality
- Training for state and local resource

Thank you for this opportunity. Massachusetts continues ready to participate in this program.

Respectfully submitted,

A handwritten signature in blue ink, reading "Curtis M. Wood". The signature is fluid and cursive, with the first name "Curtis" being more prominent than the last name "Wood".

Curtis M. Wood, Undersecretary
Massachusetts Executive Office of Public Safety and Security